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Of Attorneys for Defendants, Rent-A-Center

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

BRANDEN KUNZ, BRANDON TINDOL
and JACY TODD, on behalf of themselves
and all others similarly situated,

Plaintiffs,

v.

RENT-A-CENTER WEST, INC., a
foreign corporation; and RENT-ACENTER,
INC., a foreign corporation,

Defendants.

No. 3:11-cv-00610-PK

**MEMORANDUM IN SUPPORT OF
JOINT MOTION FOR LEAVE TO
FILE CONFIDENTIAL
SETTLEMENT AGREEMENT
UNDER SEAL**

This Memorandum is filed in Support of the parties' Joint Motion for Leave to File a Confidential Settlement Agreement Under Seal.

The Confidential Settlement Agreement, attached hereto as Exhibit 1, resolves an action for unpaid wages under the Fair Labor Standards Act of 1938, as amended ("FLSA"), 29 U.S.C. § 201 *et seq.* The FLSA, 29 U.S.C. 216(c), requires Court approval of a settlement agreement related to a claim for payment of back wages. The Settlement Agreement contains a

confidentiality provision that requires the parties to maintain the confidentiality of terms of the agreement. To allow the Court to approve the Settlement Agreement, and to avoid a breach of confidentiality provision, the parties request that this Court seal the document.

As required by LR 3.7(e), filed herewith is a proposed order identifying the parties to this case and their counsel as the persons who are authorized to review, copy, photograph, and/or inspect the materials to be sealed and (b) instructing the clerk that the document should be excluded from the electronic docket as well as the public case file.

Dated this 5th day of November, 2012.

Respectfully Submitted,

PETER STUTHEIT ATTORNEY AT LAW
LLC

By: /s/ Peter Stutheit
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Brandon Tindol and Jacy Todd

Respectfully submitted,

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